



California Association of Nutrition and Activity Programs

Farm Bill 2007 Listening Session

August 1, 2006

Sacramento, California

Thank you for the opportunity to offer our Farm Bill recommendations.

The California Association of Nutrition and Activity Programs (CAN-Act) is a recently-formed network of local providers and contractors who administer the Food Stamp Nutrition Education Program (FSNE), most of whom receive funding through the California Nutrition Network (CNN). CAN-Act's initial objectives are to pursue FSNE reforms and improvement through independent legislative and administrative advocacy; strengthen peer support and grassroots leadership; and improve provider training, technical assistance and communications.

Improve the Effectiveness of the Food Stamp Nutrition Education (FSNE) Program

Background

The purpose of the Food Stamp Nutrition Education Program is to help low-income families achieve nutrition and physical activity goals consistent with the 2005 Dietary Guidelines for Americans and to help reduce food insecurity, hunger, and costly health disparities such as obesity and type 2 diabetes. USDA's Food Stamp Program provides matching funds to states to implement Food Stamp Nutrition education programs.

Maximizing the ability of FSNE programs to be more effective will reduce risk of chronic diseases and health disparities in this vulnerable population group. FSNE needs to focus on behavioral and environmental intervention approaches that encourage and empower food stamp recipients to eat a healthier diet, rich in fruits and vegetables, that is consistent with the 2005 Dietary Guidelines. Significant changes need to be made to USDA's FSNE policies. The 2007 Farm Bill provides an opportunity to strengthen FSNE and improve dietary and health outcomes for low-income Americans. Congress needs to ensure that USDA makes significant changes to FSNE Program Guidance, to encourage more effective public health interventions that will result in the desired behavior changes conducive to improving health.

Current FSNE Guidance, which has been significantly tightened in recent years, is too restrictive and too limited to enable FSNE state programs to: (1) effectively reach target food stamp recipients and; (2) empower behavior changes consistent with the 2005 Dietary Guidelines, including increased fruit and vegetable consumption. To highlight a few examples of current FSNE restrictions and limitations:

1. Current USDA FSNE guidance limits state FSNE programs from effectively reaching their target populations. In some states over one-half of the food stamp population lives outside approved FSNE census tracts.

2. Current guidance narrowly defines "allowable activities" to focus on one-on-one direct education that reaches fewer people at far higher cost. FSNE state and local programs should be allowed, even encouraged, to utilize proven-effective, targeted, and population-based public health interventions that reach food stamp recipients in multiple venues where they live, work, go to school, and make their food choices.
3. Current guidance hampers sound evaluation efforts, including community assessments, and effective social marketing, environmental and systems change approaches. With the obesity epidemic and serious health disparities problems disproportionately impacting low-income Americans, it is imperative that programs be allowed to base their approaches on substantive and sound evaluations.

Needed: Innovative Approaches and Consistent Policy

Food Stamp reauthorization as part of the Farm Bill offers an opportunity to stabilize and improve FSNE. Reforms are needed in two key areas: Program Administration and Nutrition Education Approaches.

A. Program Administration

1. *Participatory program guidance.* Constant changes to FSNE guidance make it difficult for FSNE program operators to plan. A set of guidelines should be issued for public comment, and these guidelines should remain in effect until such time any proposed changes have gone through the public comment process prior to adoption.
2. *Simplify documentation.* Current documentation requirements are excessive, overly costly, and not aligned with requirements of other federal programs, and need to be streamlined.
3. *Multi-year plans.* An extraordinary amount of time is spent by state personnel at all levels in developing and compiling voluminous and repetitive annual nutrition education plans. Allow states to submit nutrition education plans for at least a three-year period of time.
4. *Increased fiscal flexibility.* Myriad and nit-picking USDA rules (for example, no stipends for grassroots para-educators, no pooling FSNE funds with other funds for incentives, etc.) impede effective planning and operations of nutrition education programs. Give states greater flexibility in utilizing FSNE funds for legitimate nutrition education aims.
5. *Good faith targeting.* Many eligible and potentially eligible food stamp households do not benefit from FSNE projects due to current newly imposed targeting requirements, which only allow projects in census tracts where 50% or more of the population is eligible for food stamps (or with a waiver, 50% or more of the population is at or below 185% of the FPL). In California, more than 50% of FSNE-eligible households live outside of those types of concentrated poverty tracts – are they any less in need of FSNE support? Are children who attend schools where only 48% are Free and Reduced any less deserving of nutrition education? Relax FSNE targeting rules and allow states to document genuine efforts to target eligible populations.

B. Nutrition Education Approaches

In order to be consistent with Congressional intent and make the most productive use of FSNE funds, we recommend the following principles be incorporated into reauthorization of the Nutrition Title with respect to food stamp nutrition education:

1. *Cost effectiveness.* Approaches used should be cost effective – e.g., large numbers of people should be reached relative to dollars spent.
2. *Complementary.* FSNE funds should be used on complementary approaches that result in a comprehensive approach to nutrition education, complementing existing efforts from other federal nutrition programs such as WIC, EFNEP and School Meals.
3. *Systems and environmental change.* Approaches that focus on changing systems, policies and organizational practices that influence the food environment should not only be allowed, but encouraged, with FSNE funds.
4. *Incorporate physical activity.* FSNE funds can only be used for “brief physical activity demonstrations” and the promotion of the concept of physical activity “in the context of delivering nutrition education.” This approach is unlikely to change PA related behaviors. Approaches that address physical activity in equal measure to nutrition should be allowed.
5. *Incorporate federal nutrition program outreach.* Federal food program outreach was encouraged by FSNE for some time; it is now ridiculously prohibited. Local FSNE programs are already serving food stamp eligible individuals and their children; it would be a logical use of FSNE funds to conduct limited outreach in the context of delivering nutrition education.
6. *Establishment of EBT systems at farmers’ markets.* FSNE funding should support the primary goal of increasing fruit and vegetable consumption by food stamp participants by increasing the number of venues where food stamp recipients can purchase fruits and vegetables.

Additional Resources:

Link to USDA Food Stamp Nutrition Education Plan Guidance –

http://www.nal.usda.gov/foodstamp/guidance/FSNE_Plan_Guidance_FY2007.pdf

For more information on CAN-Act, please contact Acting Director Melody Steeples, at 925/323-1932, or msteeples@yahoo.com.